

Submission Cheat Sheet

Bromelton Energy and Resource Centre (BERC) · SDA application AP2026/001 · submissions close 16 November 2026

Anyone can make a submission. You don't need to be an expert, and your own words count. It takes about 20 minutes.

Your kit: this cheat sheet, the blank template to fill in, an example completed submission, and a one-page guide to sending it. These match the Stackplume “write your own submission” helper (stackplume.com), which uses the same eight issues, facts and page numbers.

The five must-haves

The Coordinator-General may ignore a submission that is missing any of these:

- **In writing.** On paper, by email, or through the government's online form.
- **On time.** It must arrive by the closing date in the public notice (16 November 2026).
- **Your name and address.** For every person making the submission.
- **Signed.** Sign by hand if you post it. Sending it by email or through the online form counts as signing.
- **Your reasons and the facts.** Say what you object to and why, and the facts you rely on.

Source: Office of the Coordinator-General, “Have your say” fact sheet (July 2026).

What makes a submission count

The Coordinator-General's office gives these tips. They are the reason this kit asks for facts and where they come from:

- **Link your points to the section or document** you are talking about, with the report and page number.
- **Source your claims.** Say where a fact comes from, so it can be checked.
- **Offer practical solutions.** Say what you want done about it.
- **Be organised.** One concern at a time, clearly set out.
- **Make your own submission.** The office has said each person should make a unique one, and that the number of signatures “does not necessarily change” how a decision is considered.

A word on tone

You can share how you feel anywhere. In a submission, our view is that the facts, with where they come from, are what the Coordinator-General's office can act on. Describe how this affects you in plain, calm words, then give the fact and what you want done. It is an offence to give the Coordinator-General information you know is false or misleading, so only state what you can point to. This is Stackplume's advice, not a rule set by the office.

Filling in the template, box by box

1. **Name of project.** Already filled in. Check it matches the public notice.
2. **Your details.** Full name and street address are a must. Email helps. Phone is optional.
3. **About me.** Two or three sentences: your family, work, farm or business, and how this touches your daily life. This is what makes your submission yours.
4. **What I am asking for.** Tick the boxes you agree with. They are worded the same way as in the helper.
5. **My concerns.** One concern per row. Pick from the eight issues below, or use your own. In each row: name the issue, say how it affects you, give the fact and where it comes from, and say what you want done. Two or three concerns done well beat ten done quickly.
6. **Declaration and signature.** Sign and date it. If others in your household agree, each person can add their name, address and signature, or better still, make their own submission.

Tips

- Use your own words. Copied submissions carry less weight.
- Be specific about your situation: your road, your water tank, your farm or business.
- Keep a copy of what you send.

Please note

Submissions are not confidential. Cleanaway can get a copy, and it may be made public. Leave out anything you would not want others to read.

When you have finished, use the "How to send your submission" sheet. It gives the email address, subject line and file name.

Eight issues you could raise

Pick the ones that matter to you. The facts come from Cleanaway's own published application documents, the agencies' referral responses and the Bromelton SDA Development Scheme (Cleanaway's documents are at cleanaway.com.au/bromelton-energy-and-resource-centre). Page numbers are the documents' printed page numbers. Checked against the 1 October 2026 release.

1. A region that markets itself on clean, local food has had that identity ignored

In short: The Scenic Rim has won back-to-back state tourism awards for its "Eat Local" food movement, and is a certified Eco Destination — one of only a handful in Australia. None of this is mentioned anywhere in Cleanaway's assessment of the project.

Key facts

- The Scenic Rim's Eat Local Movement won a silver award for Excellence in Food Tourism at the 2022 Queensland Tourism Awards and a bronze award in the same category in 2023 — a Council-and-agribusiness collaboration showcasing local produce such as camel milk feta, olives, organic coffee, goat milk gelato and locally brewed beer. (*Scenic Rim Regional Council news releases, 2022 and 2023 Queensland Tourism Awards*)
- A search of every published application document finds no mention of "Eat Local," "food tourism," "farm gate," "Ecotourism," "ECO Destination" or "Green Destination" anywhere — despite both recognitions predating Cleanaway's own Socio-Economic Impact Assessment (21 July 2026). (*Checked across all published application documents, 7 October 2026*)
- The Project is expected to provide 50–60 operational jobs. Agriculture, Forestry and Fishing (15.1%) and Accommodation and Food Services (5.1%) together account for close to 3,800 of the Scenic Rim LGA's 18,767 employed residents — more than 60 times the top end of the jobs the project promises. (*Appendix V, Socio-Economic Impact Assessment (Rev D), Table 8, pp. 40–41 (jobs figure), s 4.4.1 and Table B4 (employment figures, ABS 2021 Census)*)

You could ask for

- Require an assessment of the project's risk to the Scenic Rim's food-tourism brand and its Ecotourism Australia certification, including consultation with the growers, producers and agribusinesses who depend on the region's clean, green reputation.
- Require a proper comparison of the jobs the project would create against the jobs and businesses already built on the region's food and farming identity.
- Treat this omission as a reason to require a full Environmental Impact Statement (EIS).

Make it yours. Say, for example, if you grow, make or sell food in the Scenic Rim, or your livelihood depends on the region's reputation as a clean, green food destination.

2. Aboriginal cultural heritage: the assessment itself has not been published

In short: The land for this project holds real Aboriginal cultural heritage — Cleanaway's own survey found seven heritage sites and says more is likely to be there. The detailed report behind those findings, done by Everick Heritage, is listed as part of the application but hasn't been made public.

Key facts

- A July 2025 field survey found seven Aboriginal cultural heritage sites within the site — including scarred trees, isolated artefacts, a potential ochre pod and a Potential Archaeological Deposit — and Cleanaway's own report concludes the site "is highly likely to retain additional Aboriginal cultural heritage." (*Appendix V, Socio-Economic Impact Assessment (Rev D)*, p. 36; *DETSI referral response*, p. 24)
- Those findings come from the Aboriginal Cultural Heritage Assessment (Everick Heritage, Rev C) — listed among the application's technical reports, but not among the application documents published for the community to read. (*Appendix V, Socio-Economic Impact Assessment (Rev D)*, p. 13; *application document index (Appendix J not published)*)
- DETSI's referral response says cultural heritage impacts "will be managed in accordance with the approved Cultural Heritage Management Plan" developed "in consultation with the relevant Aboriginal parties" — but the plan itself, and confirmation that the Danggan Balun People's own authorised representatives have agreed it (not just been consulted), has not been published. (*DETSI referral response*, pp. 10 and 24)

You could ask for

- Require public confirmation that the Cultural Heritage Management Plan has been agreed with the Danggan Balun People's own authorised representatives, not just developed "in consultation" with them.
- Require a public summary of the Aboriginal Cultural Heritage Assessment's key findings and recommendations — without necessarily disclosing sensitive site locations — so the community can see what was found and what protection was agreed.
- Treat the inability to check this from the published documents as a reason to require a full Environmental Impact Statement (EIS).

Make it yours. Say, for example, if you are a Traditional Owner or Native Title holder, or you think cultural heritage agreements with First Nations people should be able to be checked before a decision is made.

3. Impacts on commercial farming and agricultural production were not assessed

In short: Farming is the single biggest industry in this area — bigger than construction, health care or anything else. The site itself sits on land officially protected for farming under two separate state planning rules.

Key facts

- Agriculture, Forestry and Fishing is the single largest employing industry in the Scenic Rim Regional Council area (15.1% of the workforce, ahead of Health Care and Social Assistance at 12.4% and Construction at 10.1%), and the largest business sector in the Beaudesert SA2 by count (356 of 1,502 active businesses, 23.7% — more than twice the next largest, Construction, at 290). (*Appendix V, Socio-Economic Impact Assessment (Rev D)*, p. 27 and *Table B5*, p. B-3)
- The site itself is mapped under two separate State Planning Policy agriculture overlays: Agricultural Land Classification — Class A and B, and Important Agricultural Areas. (*Appendix Z, Site Searches*, pp. 15–16; *Updated Planning Report July 2026*, p. 16)
- Appendix U's "farm" exposure scenario is limited, by its own stated design, to one household's personal consumption: "The calculations are not relevant for the production of meat or milk for the commercial food supply ... The risks for meat or milk in the commercial food supply will be much lower than those calculated in this assessment." It is a personal health-exposure check, not an assessment of commercial production, crop or pasture yield, livestock health, or agricultural land value. (*Appendix U, Human Health Risk Assessment (enRiskS, Rev E)*, p. 62)

You could ask for

- Require a dedicated assessment of the project's impact on commercial farming, crop and pasture production, livestock, and agricultural land value, before any decision.

- Require the Agriculture state interest to be properly assessed for air quality and dust deposition effects on the mapped agricultural land, not dismissed on a watercourse/fisheries test alone.
- Treat this gap in the assessment as a reason to require a full Environmental Impact Statement (EIS).

Make it yours. Say, for example, if you farm, grow food commercially, or rely on agriculture for your livelihood or your community's economy.

4. Seqwater itself cannot vouch for this in a drinking water catchment

In short: Seqwater, your drinking water supplier, says Cleanaway hasn't given enough proof the plant won't put the Logan River water supply at risk. Seqwater has not identified a comparable Australian plant operating inside a drinking water catchment.

Key facts

- Seqwater "considers that the development has presented insufficient information to confirm compliance with Performance Outcomes PO9, PO11, PO14, PO28 and PO30 of the Seqwater Development Guidelines." (*Seqwater referral response*, p. 11 of 16)
- "Of all potential uses in the Bromelton SDA, the proposed facility could reasonably be considered to present the greatest risk of generating unknown, emerging and PFAS/PFOS contaminants." (*Seqwater referral response*, p. 7 of 16)
- Seqwater "has not identified a directly comparable Australian facility operating within a drinking water catchment under equivalent regulatory, feedstock and treatment conditions," and no comparable case study has been presented by the applicant. Cleanaway's own PFAS air figure comes from studies of one Swedish plant, not from measurements at BERC. (*Seqwater referral response*, pp. 6 and 8 of 16; *Katestone memo* (8 June 2026), Attachment B, p. 13; Appendix S, Appendix D)

You could ask for

- Require a detailed assessment of contaminants against the Logan Basin drinking water quality objectives, and evidence the project meets Seqwater's guideline outcomes PO9, PO11, PO14, PO28 and PO30, including PFAS, before any decision.
- Require comparable-plant evidence for a facility of this kind operating in a drinking water catchment, not reliance on one overseas plant's data.
- Treat this as a reason to require a full Environmental Impact Statement (EIS).

Make it yours. Say, for example, whether your household or farm depends on the Logan River or town water, or why a safe water supply matters to you.

5. The Coordinator-General asked for the worst case health risk modelling. Cleanaway's consultant declined.

In short: The regulator's own technical experts asked Cleanaway to test what happens if both of the plant's two processing lines ran at full capacity at the same time. Cleanaway's air quality consultant declined. Even without that worst case, Cleanaway's own modelling already shows fine-particle air pollution reaching 96% of the air quality objective near some homes.

Key facts

- With existing pollution included, annual fine-particle pollution (PM2.5) at homes and businesses is "95% with a cumulative background (for annual average PM2.5) of the relevant objectives." The highest off-site result is 6.71 µg/m³ against the 7 µg/m³ objective (about 96%). (*Appendix S, Air Quality Technical Report* (Katestone, Rev D), s 7.1.2.1, p. 52, and Table 21, pp. 54–55)
- The Coordinator-General's office told Cleanaway: "There remains a risk that the cumulative annual average PM2.5 concentration at sensitive receptors may exceed the EPP (Air) objective of 7 µg/m³." (*Human Health Technical Memorandum* (enRiskS, 16 July 2026), response to OCG item 31, p. 9)
- The results use emission limits "based on the upper end of the BAT-AEL range" — the highest, least strict emission concentrations within the European best-practice range — not what the plant is expected to actually emit. (*Appendix S, Air Quality Technical Report* (Katestone, Rev D), p. 53)

You could ask for

- Require the worst-case scenario the Coordinator-General's own reviewers asked for — both lines at their short-term limits simultaneously — to be modelled and health-assessed before any decision.
- Require a statement of how much air-shed headroom would be left for each pollutant, and results at expected emission levels as well as at the maximum limits.
- Treat the missing worst-case assessment as a reason to require a full Environmental Impact Statement (EIS).

Make it yours. Say, for example, how close you live, whether you exercise or work outdoors, or anyone in your home with breathing problems.

6. Flooding and the Logan River

In short: Cleanaway's flood modelling stops about 7 kilometres short of the Logan River — it doesn't reach far enough to show what happens when the Logan and site run-off meet in a flood. Cleanaway's own flood expert admits the model can't say at what point the site and the river would be connected during a flood.

Key facts

- The flood model "only extents [sic] to the Beaudesert Boonah Rd crossing just east of the site. Logan River is ~7 km downstream." (*Appendix R, Appendix E (Seqwater meeting of 18 September 2025), meeting notes p. 2 of 3*)
- A post-meeting note in the Seqwater meeting record, giving the advice of Cleanaway's flood modeller, says: "The model extents do not allow us to identify at what event the site and Logan River would be connected". (*Appendix R, Appendix E (Seqwater meeting of 18 September 2025), meeting notes p. 2 of 3*)
- Cleanaway's climate report says "many design events are currently being exceeded", and gives as an example the February 2022 Lismore flood in New South Wales, "nearly 2 m higher than the 1:100 AEP design flood level". (*Appendix N, Climate and Climate Change Assessment, s 5.1, p. 26*)
- In fairness, the "storage or processing of potentially hazardous waste" is located outside the 1% AEP flood extents and above the Probable Maximum Flood level. (*Appendix R, Table 14 (HYD104), p. 46*)

You could ask for

- Require the flood model to be extended to the Logan River, so the connection between the site and the river in a flood can be understood.
- Require the model to be tested against recent regional floods.

Make it yours. Say, for example, floods you have seen on the Logan River or local creeks, or roads you lose in a flood.

7. No wet or dry deposition (fallout from wet or dry weather) modelling is published for the stack

In short: "Deposition" means atmospheric fallout from the stack settling onto the ground, roofs, gardens, dams and crops during wet and dry weather, over time. Cleanaway's air pollution report doesn't publish any results for how much fallout would land from the stack — the settings needed to even model it appear to be switched off.

Key facts

- Appendix S's own "key features of CALPUFF" list names stack tip downwash, transitional plume rise, the convective PDF option, building wakes and partial plume path adjustment — but no dry deposition, wet deposition or deposition particle-size setting of any kind. The list ends "All other options set to default," and CALPUFF's deposition modules are switched off by default unless explicitly turned on and parameterised. (*Appendix S, Air Quality Technical Report (Katestone, Rev D), s A2, p. 142*)
- Dust deposition results appear only twice in Appendix S's roughly 170 pages, and both are for the separate IBA/IBAA bottom-ash storage area, not the stack. No wet or dry deposition rate, map, contour plate or compliance result for stack emissions is published anywhere in the report. (*Appendix S, Air Quality Technical Report (Katestone, Rev D), pp. 39, 71–72*)

- Appendix U nonetheless assesses soil, home-grown produce, eggs, milk, meat and rainwater tanks using "modelled dust deposition rates," applying the single maximum off-site annual figure for every chemical — for example lead 1,410 ng/m²/yr, cadmium 139 ng/m²/yr, dioxin-like compounds 7.05×10⁻⁴ ng/m²/yr — without Appendix S ever publishing what those rates are, how they were derived, or whether wet deposition was modelled at all. (*Appendix U, Human Health Risk Assessment (enRiskS, Rev E), s 5.5.4, pp. 62, 81–83, and Appendix D, p. D-5*)

You could ask for

- Require Cleanaway to disclose the deposition method, particle-size assumption and rainfall data source behind Appendix U's dust deposition rates, and confirm in writing whether wet deposition (rain washout) was modelled for the stack at all, or dry deposition only, and on what CALPUFF settings.
- Require the catchment and rainwater-tank assessment to cover the plume's full modelled extent, not just the 20×20 km domain.
- Treat this undisclosed input as a reason to require a full Environmental Impact Statement (EIS).

Make it yours. Say, for example, whether your household drinks tank water, grows food or keeps livestock, or whether you are further from the site than the 20×20 km area Cleanaway modelled.

8. Arsenic and other contamination on the site

In short: Arsenic was found in the groundwater near an old cattle dip at up to 16 times the safe drinking-water level. Despite this, the report still says the site is "suitable" for the plant.

Key facts

- Arsenic in groundwater from the two wells closest to the former cattle spray race measured 160 and 76 µg/L, against a drinking-water guideline of 10 µg/L. The report's own site criterion was 24 µg/L. (*Appendix F2, Additional Contamination Investigation (Douglas Partners), s 8.2, p. 16*)
- The report says the elevated arsenic "may be related to historical cattle dip/spray race activities", and still concludes "The spray race area is considered suitable for the proposed BERC development". (*Appendix F2, pp. 17 and 19*)
- The report does not map the arsenic. Its recommendations are further sampling if a detailed investigation is required, groundwater treatment if discharge is proposed, and an unexpected-finds protocol. Only three wells were sampled. (*Appendix F2, pp. 16–19*)

You could ask for

- Require a contamination management strategy, including mapping of the arsenic, before any decision.
- Require adequate sampling of the site.
- Require a revised Human Health Risk Assessment that takes the arsenic results into account.

Make it yours. Say, for example, whether you rely on bore water, creeks or dams downstream, or grow food or keep stock nearby.

Your own issue

If something else matters to you and you can point to where it comes from, add it as a row. Your own experience counts too. Keep it to what you know and can source, and say what you want done.

Prepared by a concerned Scenic Rim community member. Volunteers from the Keep the Scenic Rim Scenic No Incinerator Campaign Team also contribute. This is general help, not legal advice.